

Exhibit P



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Transcript of Alireza Raissinia

Date: February 14, 2025

Case: Headwater Research LLC -v- Verizon/T-Mobile/AT&T/Samsung

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Transcript of Alireza Raissinia
Conducted on February 14, 2025

1 (1 to 4)

1	IN THE UNITED STATES DISTRICT COURT	1	Video Deposition of ALIREZA RAISSINIA,
2	FOR THE EASTERN DISTRICT OF TEXAS	2	conducted virtually,
3	MARSHALL DIVISION	3	
4	-----x	4	
5	HEADWATER RESEARCH LLC, :	5	
6	Plaintiff, :	6	
7	v. : Case No.:	7	
8	T-MOBILE USA, INC. and : 2:23-cv-00379-JRG-RSP	8	Pursuant to notice, before Judith E.
9	SPRINT CORP., : (Lead Case)	9	Bellinger, Registered Professional Reporter,
10	Defendants. :	10	Certified Realtime Reporter, and E-Notary Public
11	-----x	11	in and for the State of Maryland.
12	HEADWATER RESEARCH LLC, :	12	
13	Plaintiff, :	13	
14	v. : Case No.:	14	
15	T-MOBILE USA, INC. and : 2:23-cv-00377-JRG-RSP	15	
16	SPRINT CORP., : (Member Case)	16	
17	Defendants. :	17	
18	-----x	18	
19	(Caption continued on next page)	19	
20		20	
21	Video Deposition of ALIREZA RAISSINIA	21	
22	Conducted Virtually	22	
23	Friday, February 14, 2025	23	
24		24	
25		25	
2	(Caption continued from previous page) 12:36 p.m. EST	2	A P P E A R A N C E S
3	Job No.: 571075	3	ON BEHALF OF THE PLAINTIFF:
4	Pages: 1 - 183	4	REZA MIRZAEI, ESQUIRE
5	Stenographically reported by: Judith E. Bellinger,	5	KRISTOPHER R. DAVIS, ESQUIRE
6	RPR, CRR, CSR-TX, CCR-WA, CCR-NM	6	RUSS AUGUST & KABAT
7	-----x	7	12424 WILSHIRE BOULEVARD
8	HEADWATER RESEARCH LLC, :	8	Los Angeles, CA 90025
9	Plaintiff, :	9	310.826.7474
10	v. : Case No.:	10	
11	VERIZON COMMUNICATIONS : 2:23-CV-00352-JRG-RSP	11	ON BEHALF OF DEFENDANTS VERIZON AND T-MOBILE:
12	INC.; CELLCO PARTNERSHIP :	12	ANDREW ROBB, ESQUIRE
13	d/b/a VERIZON WIRELESS; :	13	GIBSON, DUNN & CRUTCHER LLP
14	VERIZON CORPORATE SERVICES:	14	310 University Avenue
15	GROUP INC., :	15	Palo Alto, CA 94301-1744
16	Defendants. :	16	650.849.5334
17	-----x	17	
18	HEADWATER RESEARCH LLC, :	18	ON BEHALF OF THE DEFENDANT AT&T:
19	Plaintiff, :	19	KEVIN P. HESS, ESQUIRE
20	v. : Case No.:	20	MCKOOL SMITH
21	SAMSUNG ELECTRONICS CO., : 2:23-cv-641-JRG-RSP	21	303 Colorado Street
22	LTD., et al., :	22	Suite 2100
23	Defendants. :	23	Austin, TX 78701
24	-----x	24	512.692.8749
25		25	

Transcript of Alireza Raissinia
Conducted on February 14, 2025

2 (5 to 8)

1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF THE SAMSUNG DEFENDANTS IN THE

4 641 CASE:

5 JARED HARTZMAN, ESQUIRE

6 FISH & RICHARDSON P.C.

7 1000 Maine Avenue, SW

8 Suite 1000

9 Washington, DC 20024

10 202.783.5070

11 - AND -

12 TAE HONG, ESQUIRE

13 FISH & RICHARDSON

14 1180 Peachtree Street, NE

15 21st Floor

16 Atlanta, GA 30309

17 404.724.2759

18

19 ON BEHALF OF THE DEONENT:

20 DONN WASLIF, ESQUIRE

21 MORGAN FRANICH FREDKIN SIAMAS & KAYS LLP

22 333 WEST SAN CARLOS STREET

23 Suite 1050

24 San Jose, CA 95110

25 408.288.8288

5

1 C O N T E N T S

2 EXAMINATION OF ALIREZA RAISSINIA PAGE

3 By Mr. Robb 10

4 By Mr. Hess 106

5 By Mr. Robb 120

6 By Mr. Hartzman 127

7 By Mr. Mirzaie 163

8 E X H I B I T S

9 (Attached to the transcript)

10 Exhibits: PAGE

11 Exhibit 1 LinkedIn profile of Ali Raissinia 18

12 Exhibit 2 T-Mobile my Touch 3G Slide User 48

13 guide, Bates Numbers TMO_H200043878

14 - 4059

15 Exhibit 3 "Apple iOS 7:app developers explain 56

16 its key features and implications"

17 Exhibit 4 United States Patent Number 87

18 9,215,613 B2

19 Exhibit 5 United States Patent Number 95

20 8,589,541 B2

21 Exhibit 6 United States Patent Number 136

22 9,179,359 B2

25

1 A P P E A R A N C E S C O N T I N U E D

2

3 ALSO PRESENT:

4 Philip Astor, Videographer

5 Harut Akopyan, Planet Depos Technician

6

1 P R O C E E D I N G S

2

3 THE VIDEOGRAPHER: Here begins Media

4 Number 1 in the videotaped deposition of

5 Alireza Raissinia, in the matter of

6 Headwater Research, LLC v. Verizon/T-Mobile/AT&T,

7 and Headwater Research, LLC v. Samsung Electronics

8 Co, Limited, et al., in the United States District

9 Court for the Eastern District of Texas, Marshall

10 Division, Case Numbers 2:23-CV-00352, 379, 392

11 [sic], and 641 JRG-RSP.

12 Today's date is February 14th, 2025.

13 The time on the video monitor is 12:36.

14 The remote videographer today is Philip

15 Astor, representing Planet Depos.

16 All parties of this video deposition

17 are attending remotely.

18 Would counsel, please, voice-identify

19 themselves and state whom they represent.

20 MR. ROBB: Andrew Robb, Gibson Dunn,

21 for Verizon and T-Mobile.

22 MR. HESS: Kevin Hess, McKool Smith,

23 for AT&T.

24 For the record, I didn't hear the

25 397 case in the read-on, and that's the AT&T case,

7

8

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3 (9 to 12)

	9		11
1	Philip.	1	before you answer. It helps the court reporter if
2	MR. HARTZMAN: Jared Hartzman for Fish	2	we do not speak over one another. And I will try
3	& Richardson for the Samsung defendants in the	3	to do the same, where I don't speak over your
4	641 case.	4	answer with the next question.
5	With me on the Zoom is my colleague	5	Is that fair?
6	Tae Hong.	6	A Fair.
7	MR. WASLIF: Donn Waslif, representing	7	Q It's important, for the transcript,
8	the witness, Alireza Raissinia.	8	that you answer each question verbally and avoid
9	MR. MIRZAI: Reza Mirzaie, plaintiff	9	words such as -- or sounds such as uh-huh.
10	Headwater. With me on the line is my partner	10	Is that fair?
11	Kris Davis.	11	A Fair.
12	THE VIDEOGRAPHER: The court reporter	12	Q And your counsel may object to
13	today is Judy Bellinger, representing Planet	13	particular questions. Unless he instructs you not
14	Depos.	14	to answer, you should go ahead and answer,
15	The witness will now be sworn.	15	provided you understand the question.
16	ALIREZA RAISSINIA,	16	Do you agree with that?
17	being first duly sworn, was examined	17	A I do.
18	and testified as follows:	18	Q Is there any reason why you cannot give
19	MR. ROBB: Before I begin, I'll also	19	truthful testimony today?
20	note for the record that I believe that in the	20	A No reason.
21	read-on, the 379 case for T-Mobile was mentioned	21	Q Do you have any question about anything
22	but the 377 case was not, so I'll just note it's	22	I've just said?
23	for both of those related cases.	23	A No.
24	EXAMINATION BY COUNSEL FOR THE DEFENDANTS VERIZON	24	Q I understand you were deposed once
25	AND T-MOBILE	25	before in a case brought by Headwater against
	10		12
1	BY MR. ROBB:	1	Samsung; is that right?
2	Q Good morning, Mr. Raissinia.	2	A Correct.
3	A Good morning.	3	Q Have you reviewed the transcript for
4	Q Could you, please, state your full name	4	your deposition in that case?
5	for the record?	5	A I did. Close to a year ago, yeah.
6	A Yeah. Alireza Raissinia, my full name.	6	When it was first issued.
7	Q And you understand you're under oath	7	Q And based on your review of that
8	today?	8	transcript, is any of the testimony you gave in
9	A Correct, I do.	9	that deposition inaccurate?
10	Q And you understand you have an	10	MR. WASLIF: Vague. Overbroad.
11	obligation to provide truthful and accurate	11	Go ahead.
12	testimony today?	12	A There were some typos and clarification
13	A I do.	13	that needed to happen that I suggested, and that's
14	Q If you find a question is unclear,	14	it.
15	please, let me know and I will attempt to clarify	15	Q Were there any substantive inaccuracies
16	it. Otherwise, I will assume you understand the	16	in the testimony that you gave in the Samsung
17	question.	17	litigation?
18	Is that fair?	18	A Can you repeat the question?
19	A That is fair.	19	Q Were there any substantive inaccuracies
20	Q You can request breaks as needed. But	20	in the testimony you gave in the Samsung
21	I ask that you not request a break when a question	21	litigation?
22	is pending.	22	A No.
23	Is that fair?	23	Q Other than your testimony in the
24	A Correct. That's fair.	24	Samsung deposition, have you ever been deposed
25	Q Please wait until I finish my question	25	before?

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4 (13 to 16)

	13		15
1 A I don't recall. I might have.		1 A I mentioned it to my wife.	
2 Q Have you ever given -- have you ever		2 Q Is there anyone else you spoke to about	
3 testified in court before?		3 your deposition?	
4 A No. Not in court.		4 A No.	
5 Q Have you ever given sworn written		5 Q Since the Samsung -- let me back up.	
6 testimony before, for example, in the form of a		6 When was the Samsung deposition?	
7 declaration or affidavit?		7 A I recollect it was about a year and a	
8 A No.		8 few months back.	
9 Q And other than the Samsung deposition		9 Q Since the Samsung deposition, have you	
10 last year, you don't remember, one way or the		10 spoken with anyone about any issues relating to	
11 other, of whether you've ever been deposed before;		11 Headwater?	
12 is that correct?		12 MR. WASLIF: With the exception of the	
13 A That's correct. I don't.		13 attorney-client communications you've had, he's	
14 Q What do you know about this litigation,		14 already covered.	
15 specific litigation against -- brought by		15 Q Let me ask a more precise question.	
16 Headwater against Verizon and T-Mobile?		16 Setting aside the conversations you had	
17 MR. WASLIF: Vague, overbroad.		17 in preparation for your deposition today, with	
18 Can you narrow the question, Counsel?		18 your two attorneys, have you had any conversations	
19 MR. ROBB: Counsel, as you know, in		19 with anyone, for any reason, about Headwater since	
20 this district, you have to restrict the questions		20 the Samsung deposition?	
21 [sic] to form.		21 A If the conversation means talking to	
22 MR. WASLIF: Object to form.		22 someone, no.	
23 Overbroad. And it also calls for privileged		23 Q Okay. Did you have written	
24 communication because you didn't eliminate that.		24 conversations with anyone?	
25 So I don't know what you mean by the		25 A I had one text exchange with Greg	
	14		16
1 litigation. It's pretty broad.		1 Raleigh.	
2 MR. ROBB: Counsel, you have to limit		2 Q Were there any other written	
3 your objections to form in this district.		3 communications with anyone --	
4 MR. WASLIF: And you're not to include		4 A No.	
5 in your answer anything that we discussed. That's		5 Q Let me finish the question.	
6 attorney-client privilege, Mr. Raissnia.		6 Were there any other written	
7 Q With counsel's instruction, what do you		7 communications you had with anyone following the	
8 know about the lawsuit that Headwater has brought		8 Samsung deposition?	
9 against Verizon and T-Mobile?		9 A No.	
10 MR. WASLIF: Same objection.		10 Q What did you discuss with Dr. Raleigh	
11 A Nothing.		11 in that written communication you referred to?	
12 Q Nothing. Okay.		12 A He asked me a question, specifically,	
13 What did you do to prepare for your		13 whether I have received my Ph.D. degree, and I	
14 deposition today?		14 told him, no, I got my -- I worked on -- I did my	
15 A I did nothing. I only talked to Donn		15 coursework but I didn't get the degree. That's	
16 and David. For about ten minutes with Donn, half		16 it.	
17 an hour with David.		17 Q Was there any other subject matter	
18 Q And are Donn and David your attorneys?		18 discussed in your conversation with Dr. Raleigh	
19 A Correct.		19 that you're referring to?	
20 Q Did you review any documents in		20 A No.	
21 preparation for your deposition today?		21 Q Did you bring any documents with you	
22 A No.		22 today?	
23 Q Other than meeting with your attorneys,		23 A No.	
24 Donn and David, did you talk with anyone else		24 Q Where are you currently?	
25 about your deposition that was happening today?		25 A I'm in Bay Area. I live in Bay Area.	

Transcript of Alireza Raissinia
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5 (17 to 20)

	17		19
1 Q	And are you physically in your house	1 Q	Is what I've uploaded as Exhibit 1 a
2 right now? Where are you?		2 true and correct copy of your LinkedIn profile?	
3 A No, no. I'm in my office.		3 A Okay. Yeah. Yes, it is.	
4 Q	In your home office?	4 Q	Okay. Thank you.
5 A Work office. Work office. At		5 Does your LinkedIn profile accurately	
6 Qualcomm.		6 capture your work history?	
7 Q	So you're at Qualcomm right now?	7 A Yeah, pretty much. Yeah.	
8 A Correct.		8 Q	Are there any inaccuracies in your
9 Q	And is your counsel in the building	9 LinkedIn profile?	
10 with you?		10 A Not really. I think -- I haven't	
11 A No.		11 looked at it for a long time, but I -- Qualcomm,	
12 MR. WASLIF: No.		12 Headwater, Headwater.	
13 Q	I would ask that while we're on the	13 MR. WASLIF: Read it to yourself.	
14 record, that you refrain from having any		14 Because the court reporter's going to take down	
15 communications with anyone, including your		15 everything.	
16 counsel, unless it's actually via this Zoom, i.e.,		16 A Yes, it's a pretty good representative.	
17 for example, please don't email your counsel while		17 Correct. It's correct.	
18 we're on the record.		18 Q	So you were at Qualcomm from 2006 until
19 Can you agree with that?		19 2009; is that right?	
20 A Sure.		20 A Correct.	
21 Q	Mr. Raissinia, I have uploaded --	21 Q	And then in 2009, you left Qualcomm to
22 actually, sorry. Strike that.		22 join Headwater and ItsOn, correct?	
23 I'm going to upload it properly marked.		23 A Yes.	
24 You can ignore the PDF I just uploaded.		24 Q	And you were with both Headwater and
25 MR. WASLIF: Andrew, I couldn't hear		25 ItsOn for, approximately, one year, and in 2010,	
	18		20
1 you. I'm sorry.		1 you left ItsOn and then only worked at Headwater	
2 MR. ROBB: I uploaded the PDF before I		2 through 2011, correct?	
3 designated it Exhibit 1, so I'm just re-uploading		3 A Yeah. I guess, physically, you could	
4 it.		4 say I left, but I was -- I mainly focused on the	
5 PLANET DEPOS TECHNICIAN: Do you want		5 Headwater work, as opposed to ItsOn, yes.	
6 me to open it?		6 Q	Then 2011, you went back to Qualcomm
7 MR. ROBB: No. Hold on just one		7 and left Headwater, right?	
8 second.		8 A Right.	
9 PLANET DEPOS TECHNICIAN: Sorry.		9 Q	And you've been at Qualcomm ever since?
10 (Exhibit 1 marked for identification		10 A Correct.	
11 and attached to the transcript.)		11 Q	Since -- do you recall when, in 2011,
12 BY MR. ROBB:		12 you left Headwater?	
13 Q	Mr. Raissinia, I had -- I keep calling	13 A I think somewhere around -- I joined	
14 you Mr. Raissinia. Is it correct that you		14 Qualcomm January, if I remember correctly. Early	
15 still -- you don't have a Ph.D.; is that right?		15 January. I don't know, January 8, 9, something	
16 A Right.		16 like that.	
17 Q	So, Mr. Raissinia, I have uploaded, as	17 I probably had left Headwater before	
18 a document marked as Exhibit 1, a PDF which I		18 Christmas or something like that.	
19 believe is of your LinkedIn profile, retrieved		19 Q	After leaving Headwater at the end of
20 this month.		20 2011 and joining Qualcomm in the beginning of	
21 Can you, please, let me know when you		21 2012, have you had any substantive interactions or	
22 open it.		22 contributions to Headwater?	
23 A The Exhibit 1, EX1?		23 A No. Not at all.	
24 Q	EX1, yes.	24 Q	Are you aware of what ultimately
25 A Okay.		25 happened to ItsOn?	

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6 (21 to 24)

	21		23
1	MR. WASLIF: Objection. Vague.	1	MR. WASLIF: Same objections.
2	A No. I don't quite know what happened.	2	A No.
3	Q Do you have a general understanding	3	Q Do you have any view or information,
4	that ItsOn no longer exists?	4	sitting here today, about whether AT&T infringes
5	A Correct. That understanding is	5	any of Headwater's patents?
6	correct.	6	MR. WASLIF: Same objections.
7	Q Beyond the understanding that ItsOn no	7	A No.
8	longer exists, do you have any understanding of	8	Q Do you have any view or information,
9	the details of what caused ItsOn to shut down or	9	sitting here today, about whether Samsung
10	the process by which ItsOn shut down?	10	infringes any of Headwater's patents?
11	A Not at all.	11	MR. WASLIF: Same objections.
12	Q Have you had any insight into inner	12	A No.
13	works of Headwater since you left the company in	13	Q Sitting here today, do you have any
14	2011?	14	view or information about whether any of the
15	A No.	15	products or services offered by Samsung or Apple
16	Q Have you been --	16	16 or Google infringes any of Headwater's patents?
17	MR. WASLIF: Pardon me. One second,	17	MR. WASLIF: Form. Calls for an
18	Andrew.	18	opinion, which he's not here to give.
19	Madam court reporter, are you getting	19	Go ahead.
20	my objections or can you hear me?	20	A No.
21	Q Mr. Raissinia, I would suggest that --	21	Q When did you first meet Dr. Raleigh?
22	your counsel can tell you the same thing, but I'll	22	A 1995. I don't remember exactly the
23	tell you. If you could just wait one second	23	month or what. But somewhere around that time.
24	because you and Mr. Waslif are talking over each	24	Q And did you interact with Dr. Raleigh
25	other.	25	when you were at Qualcomm in the 2006 to 2009
	22		24
1	MR. WASLIF: Thank you for that,	1	stint?
2	Counsel.	2	A Very little.
3	Q Since leaving Headwater in 2011, have	3	Q While you were at Qualcomm in that 2006
4	you had any involvement, whatsoever, in the	4	to 2009 period, what were your interactions with
5	prosecution of any of Headwater's patents?	5	Dr. Raleigh?
6	A No.	6	MR. WASLIF: Objection. Vague. Form.
7	Q Since leaving Headwater in 2011, have	7	A If any, it was not work related because
8	you had any discussions with any individuals about	8	he was actually in San Diego and I was in Bay Area
9	the prosecution of any of Headwater's patents?	9	and I was focused on stuff that he was not. He
10	A No.	10	was doing something different, apparently.
11	Q Since leaving Headwater in 2011, have	11	Q At a high level, what were the kinds of
12	you had any discussions with anyone relating to	12	things you were working on at Qualcomm from 2006
13	alleged infringement by industry participants of	13	to 2009?
14	any Headwater patents?	14	A I was working on or we were working on?
15	MR. WASLIF: Object to form.	15	I wasn't working with Greg Raleigh on anything. I
16	A No.	16	was working on engineering technology.
17	Q Do you have any view or information,	17	Q I was asking you what you were working
18	sitting here today, about whether Verizon	18	on. So at a high level, what were you working on
19	infringes any of Headwater's patents?	19	at Qualcomm from 2006 to 2009?
20	MR. WASLIF: Object to form. Calls for	20	MR. WASLIF: Object to the form.
21	an expert opinion, which he's not here to give.	21	And the question calls for at a high
22	A No. I don't even know.	22	level, as opposed to anything that would be
23	Q Do you have any view or information,	23	confidential to Qualcomm.
24	sitting here today, about whether T-Mobile	24	A It's more engineering technology.
25	infringes any of Headwater's patents?	25	Q What caused you to leave Qualcomm in

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44 (173 to 176)

	173		175
1 A Yes.		1 Q Anyone who says otherwise would be	
2 Q Do you remember he asked four or		2 wrong, right?	
3 five -- he asked that question four or five times		3 MR. ROBB: Object to form. And I'll	
4 in a row?		4 make a standing scope objection.	
5 Do you recall that?		5 A Correct.	
6 MR. ROBB: Object to form.		6 Q I believe earlier you said that Greg	
7 A Yes.		7 was the driver on certain ideas and interactions	
8 Q But if an app can be woken up in the		8 with certain companies.	
9 background and make API calls, then there's		9 Do you recall that?	
10 certainly something for a policy to apply to and		10 A Yes, I did say that. I'm not sure	
11 block, right?		11 that -- yeah, I did.	
12 MR. ROBB: Object to form.		12 Q So, with respect to certain meetings	
13 A Correct.		13 with various carrier companies, it's better to ask	
14 Q And if there is a policy blocking		14 him or someone else at ItsOn and not you, correct?	
15 network access for the app, that's indicating that		15 A Correct.	
16 there's some periods when the app can wake up so		16 Q And I think you got questions today	
17 you want to have the policy in place, fair?		17 about whether you're aware of any misconduct and	
18 MR. ROBB: Object to form.		18 other synonyms of misconduct by the carriers.	
19 A Fair.		19 Do you recall that?	
20 Q Now, earlier today, Mr. Robb also asked		20 A I do.	
21 if Headwater developed any real -- strike that.		21 MR. ROBB: Object to form.	
22 Earlier today Mr. Robb asked, four or		22 Q And you haven't reviewed, you haven't	
23 five times, whether Headwater developed any real		23 been provided or reviewed any of the confidential	
24 technology or just wrote ideas down on paper.		24 emails or other documents from the carriers in	
25 Do you recall that?		25 this case, right?	
	174		176
1 MR. ROBB: Object to form.		1 A Correct.	
2 A I do.		2 Q And even with respect to your time at	
3 Q Do you recall him asking that same		3 ItsOn, there are other people, as we just	
4 question four or five times in a row, too?		4 established, who are better to ask questions about	
5 MR. ROBB: Object to form.		5 that topic, such as Dr. Greg Raleigh, correct?	
6 Argumentative. Form.		6 MR. ROBB: Object to form.	
7 A I do.		7 A Correct.	
8 Q You just meant that Headwater did not		8 Q You were also asked questions about,	
9 develop product development, correct?		9 early this morning, about the goal of Headwater's	
10 MR. ROBB: Object to form.		10 solutions.	
11 A Correct.		11 Do you recall that?	
12 Q You're not suggesting that Headwater		12 MR. ROBB: Object to form.	
13 didn't develop real technology in its patents, are		13 A Yes, I did remember.	
14 you?		14 Q And you didn't have any of the patents	
15 MR. ROBB: Object to form.		15 in front of you during this portion of the day, in	
16 A No.		16 the morning, when you were asked those questions,	
17 Q And you're proud of your patents,		17 I'll just represent that.	
18 correct?		18 So, your testimony about the goals of	
19 A Absolutely.		19 the solution wasn't about any specific claim of	
20 Q And, by the way, the patents that list		20 any patent, correct?	
21 you and Dr. Greg Raleigh, and possibly other		21 MR. ROBB: Object to form.	
22 inventors, you all, as inventors, did not develop		22 A Correct.	
23 that during your time at Qualcomm, correct?		23 Q And you were only there in 2009 and	
24 MR. ROBB: Object to form and scope.		24 2010; is that right?	
25 A Correct.		25 A I believe so. I was there a couple	

	177	
1 Absolutely, yeah.		179
2 Q And any other time periods, it's better		
3 just to ask Dr. Raleigh; is that fair?		
4 A Absolutely, yeah.		
5 Q And even in that time period, you		
6 weren't speaking on behalf of Dr. Raleigh; you		
7 were just speaking on behalf of yourself, correct?		
8 A Correct.		
9 Q You were also asked questions about		
10 Headwater's motivations in 2009 and '10, and I		
11 just had some of the same questions.		
12 You were just speaking on behalf of		
13 yourself from 2009 to 2010, fair?		
14 MR. ROBB: Object to form.		
15 A Correct.		
16 Q You were also asked a few questions		
17 about prior art today. And similar to my		
18 questions from a few minutes ago, you haven't		
19 compared the construed claim language in any of		
20 the claims in any of these patents to the prior		
21 art, correct, in preparation for your testimony		
22 today, correct?		
23 A No, not for testimony today.		
24 Q Now while you were working at Headwater		
25 and/or ItsOn in 2009 to 2010, you weren't involved		
	178	
1 in every single ItsOn project or on every single		
2 ItsOn email, correct?		
3 A Absolutely correct.		
4 Q Would Dr. Raleigh be a better person to		
5 ask about the -- perhaps, certain projects you		
6 weren't involved in or meetings that you weren't		
7 involved in?		
8 MR. ROBB: Object to form.		
9 A My recommendation, Dr. Raleigh would be		
10 the right person to talk to.		
11 Q And we talked about this a little bit		
12 in your past deposition, but I believe you		
13 testified that Dr. Raleigh has a unique way of		
14 solving problems in the various technical fields,		
15 correct?		
16 MR. ROBB: Object to form.		
17 A Correct. My view, yeah.		
18 Q Can you explain that a little bit more?		
19 MR. ROBB: Object to form.		
20 A Well, he tends to have broad knowledge		
21 and have a way of putting different ideas together		
22 and to come with an impactful, I'll call it,		
23 impactful and wide, broad patent ideas and		
24 innovations. So, he has that tendency, yeah. I		
25 mean, I definitely enjoyed working with him for		
	180	
1 becomes a synthesizable design.		
2 The idea can be, in fact, implemented		
3 in an efficient way. Like I just said, there's		
4 only -- devices have limited resources. Not like		
5 we can just keep writing code.		
6 Q Right.		
7 A You have to be cognizant to the overall		
8 CPU, memory, power, and so forth.		
9 MR. MIRZAIE: Okay. Maybe we can go		
10 off the record for five minutes. I want to		
11 streamline the rest of my questions. I think I		
12 only have a couple minutes.		
13 MR. WASLIF: Sure.		
14 THE VIDEOGRAPHER: We are going off the		
15 record at 18:36.		
16 (Recess taken.)		
17 THE VIDEOGRAPHER: We are back on the		
18 record at 18:43.		
19 MR. MIRZAIE: Mr. Raissinia, I don't		
20 have any further questions at this time.		
21 THE WITNESS: All right. Thank you.		
22 MR. WASLIF: Anybody else have any		
23 other questions?		
24 MR. ROBB: None from me.		
25 MR. HESS: None from me.		